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February 16, 2024

Via Electronic Mail

Honorable Stacey L. Meisel
U.S. Bankruptcy Court, District of New Jersey
chambers_of_slm@njb.uscourts.gov

Re: IQ Dental Supply, LLC
Case no. 23-21402 (SLM)
Request for In-Chambers Conference

Dear Judge Meisel:

This office represents creditor, Larisa Kunin, the estranged spouse of Sergey Kunin, the managing member and 50% owner of IQ Dental Supply, LLC. Ms. and Mr. Kunin have been separated since 2018 and embroiled in marital dissolution proceedings for the past three years.

My client filed a secured claim, Claim 64, pursuant to a New Jersey Superior Court Order dated February 7, 2022, determining the Debtor to be in possession of funds belonging to the marital estate. Although Mr. Kunin conceded on the record the funds are marital assets and was ordered individually and as the managing member of the Debtor to deposit these funds into trust, he has continuously refused and caused the Debtor to refuse to do so. My client's interest in the funds held by the Debtor is not addressed at all in the Plan filed by the Debtor or properly disclosed to creditors in the Disclosure Statement.

In an attempt to avoid marital litigation coming into this Court, I am respectfully requesting an in-chambers conference with the Court and Debtor's counsel to discuss a potential resolution of this issue.

Respectfully submitted,

GENOVA BURNS LLC

/s/ Susan S. Long
SUSAN S. LONG

SSL:drm

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